

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
Defendant.)	

**SPECIAL MASTER ROBERT B. PINCUS’ MOTION AND PROPOSED ORDER
GRANTING LIMITED EXEMPTION FROM THE STANDING ORDER
REGARDING PERSONAL ELECTRONIC DEVICES**

Special Master Robert B. Pincus (“Special Master”) respectfully requests an exemption at the May 17, 2024 Hearing for his counsel, Ray C. Schrock, Alexander W. Welch, and Wesley Sheker (“Counsel”) from the Court’s Standing Order, effective May 15, 2023, titled *In re: Procedures Regarding the Possession and Use of Cameras and Personal Devices by Visitors to the J. Caleb Boggs Federal Building and United States* (“Standing Order”). Pursuant to paragraph 2 of the Standing Order, all cell phones and personal electronic devices are required to be off and placed in a locked pouch while visitors are in the courthouse. Paragraph 4 of the Standing Order exempts attorneys with a valid bar card.

Counsel are in good standing, with at least one State bar admission in the United States. However, Counsel do not meet the exemptions listed in Paragraph 4 of the Standing Order, as they do not have issued attorney bar identification cards. As such, the Special Master requests an exemption for Counsel from the Standing Order identical to attorneys that possess a valid bar identification card. Counsel will continue to be bound by Local Civil Rule 83.2 prohibiting photographs or broadcasting.

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Counsel for Special Master Robert B. Pincus

Dated: May 15, 2024
11503238 / 21202.00001

IT IS SO ORDERED this ____ day of _____, 2024.

The Honorable Leonard P. Stark